Comment Table, Multi-Species Conservation Strategy

Comment Number	Chapter/ Sub-Chapter	Page Number	Paragraph, Section, or Table No.	Commentor/ Agency	Comment
1	General Comments			Peter Stine, USGS	In several parts of the Multi-Species Conservation Strategy (MSCS) there is reference to the relationship with the ERP. Some sections of this document describe the "ERP as the basis for the MSCS goals" (Section 3) and in other places it describes the MSCS as something substantially different (Section 1.3). Perhaps both are true, depending on what perspective one has. However, it seems it would be very useful to blend the two programs (ERP and MSCS) into one. This would help in terms of making the overlap between the two programs seamless and to clearly indicate what additional requirements there are with the MSCS. The final development of the monitoring and research activities would benefit from this clarification. Efficiencies could be identified and potential duplication of effort could be avoided.

					The MSCS should consider the application of adaptive management in the context of rare species that are protected by law. If an adaptive management program is to be executed it will undoubtedly involve some protected species. This document should explore what latitude there will be to develop experimental research that may involve protected species and explain how this will be accommodated within the framework of the MSCS and the regulatory requirements of the FWS, NMFS, and CDFG.

					There are some 201 taxa currently under consideration within the "m" category. Before CMARP begins to develop specific monitoring and research prescriptions this list needs to be reduced to its final level so we do not waste resources trying to address taxa that will not be included in the MSCS.
					It appears that the full impact of the MSCS on the other CALFED common programs has not yet been evaluated. Obviously the MSCS is an important and necessary feature of CALFED but it appears that it has been developed in parallel with other common programs and thus potential effects on other programs have not been fully realized yet.
					The MSCS makes reference in several places to the role of CMARP and the importance of monitoring and research to achieving the eventual objectives of the MSCS. However, the scope of this effort has not been fully addressed yet by CMARP or CALFED. In order to meet the array of requirements that CMARP has, including the significant requirements of the MSCS, this will likely translate into a fairly substantial increase of financial and human resources. The MSCS should acknowledge this requirement somewhere within the document.
2		1-5		Peter Stine, USGS	Page 1-5 The figures are difficult to read (too dark, colors do not copy well in black and white

| 3 | | 2-2 | | Peter Stine, USGS | Page 2-2 The use of habitat or vegetation maps now and in the future is clearly an important tool for the MSCS. There are two important questions that the MSCS (and ultimately CMARP) will have to answer; a) are we satisfied with the classification of habitats/vegetation that we are using and b) do we have adequate GIS data for use as the baseline data. Careful attention needs to be paid to these questions and resolution established as soon as possible. |
| 4 | | 2-11 | | Peter Stine, USGS | Page 2-11 Much of the MSCS, particularly with the "m" taxa, will rely upon a means of associating species with habitats; i.e. some sort of habitat relationship model. We understand that this will be necessary for a variety of reasons. However, we also know that this is problematic for at least two reasons; a) we do not have adequate empirical data on habitat requirements for many species, and b) many species do not respond solely to recognizable habitat or vegetation features that are mapable. Perhaps more work is needed to establish these relationships and perhaps other kinds of GIS data can help refine our ability to predict presence, absence, and abundance. The MSCS should address these issues in more depth. This comment also applies to section 5.1.3. |

| 5 | | 3-7 | | Peter Stine, USGS | Page 3-7 The prescriptions for species are needed to help create goals/targets from which monitoring programs can be developed. However, some of the prescriptions as they are stated in Table 3-1 have somewhat vague terms, e.g. "re-establish and maintain viable species populations" or "reduce the risk of current and imminent threats." In order to design specific monitoring programs that will inform managers on the progress of attaining goals, more quantitative targets are needed. This is admittedly a difficult thing to do but the MSCS should anticipate this with respect to monitoring programs that will accompany their efforts. |
| 6 | | 5-1 | | Peter Stine, USGS | Page 5-1 This section is difficult to follow. The approach discussion (on page 5-2) includes several different ways of analyzing potential CALFED program impacts on NCCP communities and evaluated species. Is there a way of weaving all these methods together, explaining how the different components inter-relate? Each of the methods includes tables and explanations and there seems to be overlap among many of them. Perhaps some introductory text in this section could lay down a map for interpreting all the approaches discussed in this section. |

				Peter Stine, USGS	Page 7-4 Is it possible for the MSCS document to anticipate into which category the monitoring and research activities associated with CMARP will fall? Presumably CMARP monitoring and research activities will fall either into Type I or Type II actions and be able to proceed without any substantial waiting period. It would be helpful if the document could discuss this specifically.
7		7-4			
8		8-1		Peter Stine, USGS	Page 8-1 Ongoing monitoring for the "R" and "r" species is adequate in some cases, but there are a number of these species for which existing activities are inadequate to meet the overall goals of the ERP and the MSCS. More focused efforts will be required for the majority of the bird, mammal, reptile, amphibian, invertebrate, and plant species within those two categories.
9		8-2		Peter Stine, USGS	Page 8-2 Tracking changes in the distribution and abundance of habitats can be accomplished using GIS and remote sensing. However, tracking the distribution and abundance of species within those habitats requires much different field protocols and is significantly more labor-intensive. Focused monitoring of population dynamics of selected taxa to detect species' response to management actions requires still different methods. The MSCS document should acknowledge these differences and the relative difficulty of accomplishing monitoring at these different levels of need.

| 10 | | 8-3 | | Peter Stine, USGS | Page 8-3 Text on this page addresses the concerns raised above for page 8-1, that " ... relatively little monitoring is underway" for most of the "r" taxa. Thus it does appear to contradict the claim made on page 8-1, that " ... ongoing monitoring should adequately address MSCS needs for fish and most other "R" and "r" species." |

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